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Attorney for Plaintiff

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA**

GERARDO Z MORENO,
Plaintiff,

vs.

ANDREW SAUL,
Commissioner of Social Security,
Defendant.

Case No. 1:20-CV-00788-BAM

**PLAINTIFF'S UNOPPOSED
MOTION FOR SECOND
EXTENSION OF TIME AND
ORDER**

Plaintiff moves for a 16-day extension of time from June 23, 2021 to July 9, 2021, to file Plaintiff's Opening Brief. All other dates in the Court's Scheduling Order shall be extended accordingly. Defendant's counsel has been contacted and Counsel has no objection to this request.

This is Plaintiff's second request for an extension of time. Good cause exists. Counsel for Plaintiff has four administrative hearings with the Office of Hearing Operations, one hearing before the US District Court, Eastern District of California, and two merit briefs due in US District Court. The week of June 28, 2021, Counsel

1 has 14 administrative hearings and several merit briefs that have also been schedule
2 as due that week. Counsel has also received a larger than usual volume of denials
3 from the Appeals Council triggering the 65-day deadlines for review and filing in
4 US District Court. In addition, Counsel's law firm has received several certified
5 administrative records from the OGC on cases that had been stayed due to the
6 pandemic.

7 Therefore, Counsel requires additional time to brief the issues thoroughly for
8 the Court's consideration. Counsel apologizes to the Defendant and Court for any
9 inconvenience this may cause.

10 Respectfully submitted,

11 Dated: June 18, 2021

PENA & BROMBERG, ATTORNEYS AT LAW

13 By: /s/ Jonathan Omar Pena
14 JONATHAN OMAR PENA
15 Attorneys for Plaintiff

17 Dated: June 21, 2021

18 PHILLIP A. TALBERT
19 Acting United States Attorney
20 DEBORAH LEE STACHEL
21 Regional Chief Counsel, Region IX
22 Social Security Administration

23 By: */s/ Marcelo N. Illarmo
24 Marcelo N. Illarmo
25 Special Assistant United States Attorney
26 Attorneys for Defendant
27 (*As authorized by email on June 21, 2021)
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Dated: **June 22, 2021**

UNITED STATES MAGISTRATE JUDGE